UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

WRS, INC. d/b/a WRS MOTION PICTURE LABORATORIES, a corporation,	)	
Plaintiff,	)	
vs.	)	C.A. No. 00-2041
PLAZA ENTERTAINMENT, INC., a corporation, ERIC PARKINSON, an individual, CHARLES von BERNUTH, an individual and JOHN HERKLOTZ, an individual,	)	Judge William L. Standish
Defendants	)	

PLAINTIFF'S MOTION PURSUANT TO F.R.C.P. 55 FOR ENTRY OF DEFAULT JUDGMENT AGAINST DEFENDANTS, PLAZA ENTERTAINMENT, INC., ERIC PARKINSON AND CHARLES von BERNUTH, FOR FAILURE TO OTHERWISE DEFEND

AND NOW comes Plaintiff, WRS, Inc. d/b/a WRS Motion Picture Laboratories (hereinafter referred to as "WRS") and hereby files the within Motion Pursuant to F.R.C.P. 55 for Entry of Default Judgment against Defendants, Plaza Entertainment, Inc., Eric Parkinson, and Charles von Bernuth, for Failure to Otherwise Defend:

1. On April 11, 2006, at Docket No. 97, this Court entered default as to Plaza Entertainment, Inc. and Eric Parkinson for failure to defend.

2. On April 28, 2006, at Docket No. 101, the Court entered a default against the Defendant, Charles von Bernuth, for von Bernuth's failure to defend.

3. Plaintiff has filed an Affidavit of Jack Napor, WRS's president, setting forth the amount calculated to be due and owing through his personal knowledge based upon the business records of WRS.

4. WRS has filed the Affidavit of Thomas E. Reilly, Esquire, President of Thomas E. Reilly, P.C., setting forth the attorney's fees based upon the time spent at an hourly rate charged WRS with respect to the action against Plaza Entertainment, Inc. and its guarantors.

5. Pursuant to the Stipulation between the Defendant, John Herklotz, and WRS, the business records of WRS were reviewed by Schneider Downs, Inc., as forensic accountants, to establish their reasonable reliability. The report of Schneider Downs, Inc. indicating that the records kept in the ordinary course of business of WRS are reasonably reliable and confirming the amount owed as of December 31, 2000 in the sum of $1,270,683.34 not including the fees due under the services agreement, storage charges and attorneys fees is attached hereto as Exhibit "A".

6. The Napor Affidavit, determined the amount owed based upon the business records of WRS as of October 13, 2006 to be the sum of $2,581,808.57 plus additional interest on the sum of $1,205,827.84 at the rate of 1.5% per month from October 13, 2006 and additional Attorneys fees for enforcement of an judgment.

7. Based upon the forgoing, F.R.C.P. 55(b)(2), the Court, upon the presentation of evidence, may enter a Default Judgment against the parties against whom an entry of default has previously been made.

WHEREFORE, Plaintiff respectfully requests that the Court grant Plaintiff's Motion for Entry of Default Judgment against Plaza Entertainment, Inc., Erick Parkinson and Charles von Bernuth, jointly in severally, in the sum of $2,527,029.03 plus interest from October 13, 2006 at the rate of 1.5 percent per month on the sum of 1,205,827.84 from October 13, 2006 and additional attorneys fees to be added for proceedings to enforce the judgment.

Respectfully submitted,

THOMAS E. REILLY, P.C.

BY: ___/s/ Thomas E. Reilly___

Thomas E. Reilly, Esquire
Firm I.D. #511
2025 Greentree Road
Pittsburgh, PA 15220
(412) 341-1600

CERTIFICATE OF SERVICE

I, Thomas E. Reilly, Esquire, hereby certify that a true and correct copy of the Plaintiff's Motion Pursuant to F.R.C.P. 55 for Entry of Default Judgment against Defendants, Plaza Entertainment, Inc., Eric Parkinson, and Charles von Bernuth, for Failure to Otherwise Defend was delivered via first-class mail, postage pre-paid on the _13th_ day of October, 2006 to the following:

Eric Parkinson, individually and
As President of Plaza Entertainment, Inc.
4929 Wilshire Boulevard
Suite 830
Los Angeles, CA 90010

John W. Gibson, Esquire
Greenfield Court
1035 Fifth Avenue
Pittsburgh, PA 15219

John P. Sieminski, Esquire
Burns, White & Hickton
Four Northshore Center
106 Isabella Street
Pittsburgh, PA 15212

THOMAS E. REILLY, P.C.

BY: /s/ Thomas E. Reilly
Thomas E. Reilly, Esquire
Attorney for Plaintiff, WRS, Inc.